

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

UNITED STATES DISTRICT COURT

for the

District of NevadaCivil DivisionDavid Gonzales

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-
FPI Management, Inc.
Grape Properties, Inc.
New Loft 205 Apartments, LLC.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

3:24-cv-00361

(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE

(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

David Gonzales

Street Address

65 Cactus Ct.

City and County

Reno Washoe County

State and Zip Code

Nevada 89512

Telephone Number

775-531-0686

E-mail Address

learnrights@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) David Gonzales, is a citizen of the
State of (name) Nevada.

2. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

2. If the defendant is a corporation

FPI Management Inc
The defendant, (name) & Groupe Properties Inc, is incorporated under
the laws of the State of (name) California, and has its
principal place of business in the State of (name) Nevada.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Statement of Claim

08/12/2024

David Gonzales

vs

FPI Management Inc, Grupe properties Inc. Et al.

United States District Court for the District of Nevada

Civil Division.

On August 15, 2022

The Plaintiff received a Utility Statement (Exhibit 1) per the residence of 205 South sierra st Unit # 201 Reno NV, a property operated and managed by both defendants. The utility statement (exhibit 1) confirmed the final decision taken by both defendants in violation of NRS 118A .300 " Advance notice of increase in rent."

Per monetary avarice desired by the defendants, they refused to fix the mistake and take responsibility for which they created, and admitted to. This action is proof that FPI management Inc and Grupe Properties Inc, knew the consequences and the benefits from said action.(Exhibit #3)

The plaintiff filed an affidavit in accordance with NRS 118A.300 An affidavit which was for a judge to intervene and waive the fees that were illegally imposed on the plaintiff.

Reference exhibit 5 for plaintiff and justice court of washoe for evidence of communication.

The plaintiff did attempt to reason with the defendants in a timely manner prior to seeking court intervention, See Exhibit 6.

Exhibit 7 shows the first ever notification to the plaintiff of rental increases on the Sierra st property #201.

On August 10, 2022 The plaintiff sent an email which was a request for essential services to be repaired via email. See exhibit 9.

Hours later a seven day notice for eviction was served see exhibit 10.

The plaintiff believes that this was done in retaliation, which violates NRS 118A.510, and the fair civil housing rights that the plaintiff has.

On September 5, 2022 The plaintiff received a washoe county animal service complaint which was received in the form of a letter on the front door of unit #201 in regards to a noise complaint about the plaintiffs dog making excessive noise See exhibit 11. The letter stated that the dog was barking too much and was a warning about excessive dog barking. The plaintiff had no prior noise complaints in the two years of living in unit#201 and this led the plaintiff to believe that this was also done in retaliation and was a scare tactic designed to scare the Plaintiff.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) August 15, 2022, at (place) 205 Loft Apartments in Reno N.V.,
the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because (describe the acts or failures to act and why they were negligent)

(see attachment Statement of Claim)

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by (explain)

FPI Management Inc and Grupe Properties Inc
acted on behalf of New Loft 205 apartments LLC.
creating damages for the Plaintiff by an eviction record and
homelessness.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Awarding \$10 million in punitive and exemplary damages is fair as it serves both to punish the wrongdoer and to deter similar future conduct affecting millions of tenants Nationwide.

Violating civil housing rights deserves a significant penalty because it undermines fundamental principles of equality and fairness. Such Violations can cause severe harm to individuals and communities.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: August 12, 2024

Signature of Plaintiff

Printed Name of Plaintiff


David Gonzalez

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address